



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 15, 1997

REPLY TO
ATTN OF: ECO-088

John L. Shoberg, District Ranger
U.S. Forest Service
Malheur National Forest
Long Creek Ranger District
P.O. Box 849
John Day, Oregon 97845

Ref: 96-082-AFS

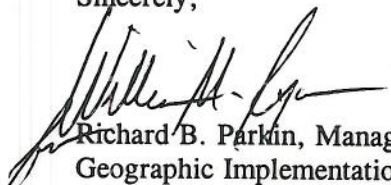
Dear Mr. Shoberg:

The Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the **Summit Fire Recovery project**. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We realize that our comments are late. However, based on our phone conversation with your staff, we understand that decisions will be made at the end of July, so we hope that these comments will be useful in making your decisions and in preparing the Final EIS.

Based upon our review, we have rated the DEIS as EC-2, Environmental Concerns, Insufficient Information. We appreciate the need to reduce fuels to prevent reburns in the Summit Fire Project area and to move toward restoring the area to its historic range of stand structure variability. Our concern is that these salvage and associated management activities not exacerbate existing conditions nor cause additional environmental impacts. Our comments address aspects of the preferred alternative, the extent to which our scoping comments are reflected in this alternative, the use of chemical controls, the need for additional assessment and information regarding refugia for wildlife, fish, areas of sensitive erodible soils, and locations of planned road construction, and the need for increased protection of streams/aquatic ecosystems.

Our comments and an explanation of the rating system are enclosed with this letter. If you have any questions or would like to discuss these comments, please contact Elaine Somers in Seattle at (206) 553-2966.

Sincerely,


Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosures

970111
EC-2

U.S. Environmental Protection Agency, Region 10
Comments for Summit Fire Recovery DEIS

Response to EPA scoping comments. The DEIS listing of significant issues raised at the scoping stage (pages 1-14 to 1-22) makes no mention of EPA as a contributor to this process. We are concerned that our comments have not been factored into the development of the EIS, and the nature of the preferred alternative seems to support this concern. Overall, Alternative 2, rather than the preferred alternative, better represents the level and nature of management activities that we would hope to see in the Final EIS. We advocate an approach and management decisions that are consistent with the goal to restore ecosystem health and integrity.

As stated in our scoping letter, a watershed/landscape-level ecosystem analysis is needed as a foundation for planning your recovery program. We understand that a watershed analysis has been completed for the project area. The DEIS should provide information from that analysis to illustrate and support a rationale for proposed actions. Include maps that indicate the location of road extensions, landscape features, e.g., fragile or unstable soils, and document native fish and wildlife species distribution and habitat location. Identify potential refugia for aquatic and terrestrial species and discern which areas, if entered, would result in disproportionate impacts to native biota.

Amount of timber harvest volume and percentage of acres treated. As stated in our scoping letter of 12/12/96, we support your efforts to restore the area to its historic range of vegetation and to re-introduce a more natural disturbance regime. The affected environment, however, is highly disturbed and includes many streams that do not meet minimum water quality objectives, such as water temperature, large woody debris, pools per mile, width to depth ratios, and bank stability. Intensive salvage logging (110 mmbf from 11,400 acres), road building and reconstruction, coupled with existing high road densities will introduce additional disturbances--particularly soil erosion and sedimentation of streams--to this system.

Based on the existing conditions, we again urge you to take a more light-handed approach to resource extraction and management, while reducing fuel loads to safer levels. The preferred alternative represents the most aggressive salvage program of all the presented alternatives, and maximizes salvage activity within roadless and other special emphasis areas.

RHCAs. In light of the stream conditions described above, the Clean Water Act S. 303(d) stream listings, the high road densities in the project area (6 to 7 miles/square mile in some areas), and the need to effect habitat recovery for sensitive and candidate species of fish, at a minimum we would hope to see full implementation of PACFISH specifications. Alternative 2 does so; the preferred alternative does not. Intermittent, non-fish bearing, and fish bearing streams should all receive greater protection than that which is proposed, particularly in view of the fact that with increasing road density, the benefits from forestry best management practices (BMPs) decrease.

Needs of wildlife. As we discussed in our phone conversation and in our scoping letter, special consideration should be given to wildlife that are affected by the Summit fire habitat losses. Snags and large woody debris should be retained at levels that maximize their beneficial uses for wildlife within the Wildlife Emphasis Area, the dedicated old growth stands, and the replacement old growth stands. However, these features should be retained in adequate quantities across the landscape. As per the recommendations of USFWS, we urge you to increase the level of retained snags of 21 inches dbh or greater to at least 6 per acre. This would be in addition to wood/snags

Grazing pressure may retard or prevent growth, development, and maintenance of planted or naturally re-occurring riparian and adjacent upland vegetation, and will increase soil disturbance, e.g., compaction and erosion. Regrowth of healthy and diverse riparian zones is essential for ameliorating elevated stream temperatures, stabilizing streambanks, reducing sedimentation in streams, providing food and cover for aquatic and terrestrial species, and supplying future large organic debris in the streams. Thus, we urge you to rest grazing allotments indefinitely to allow for full vegetative recovery.

Summary Paragraph Form

ERP Number D -AFS-L65286-OR

RATING EC-2

COMMENTLTR

7/15/97

Name of EPA Official Responsible For Review Of Project (Principal Reviewer)

Elaine Somers

Summary

expressed environmental about potential adverse impacts
~~EPA's concerns is that these salvage and associated management activities~~
not exacerate existing conditions nor cause additional environmental
impacts.

Approved For Publication

(Initials of OFA
Approving Official)

Note: Transmit 2 copies to MIU